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Sent: Wednesday, August 31, 2016 9:54 AM
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Cc: Michael Fitzpatrick; Rachel P. Hurt; Leslie Dunn
Subject: New England Compounding Pharmacy, MDL 2419 - E-Discovery Review of Records from Seven Hard-Drives

Counsel:

This week, after completing the forensic report review, we began the process of reviewing records which were responsive to the term search and date restriction set forth in the protocols for the e-discovery phase of the seven hard-drives imaged by Logic Force. During our review, it has become apparent that the approximately 20,000 records returned by the search protocols does not adequately quantify the amount of information that must be reviewed.

We reached out to Genta from Logic Force and asked for an approximate number of pages that comprise the 20,000 records. She estimates that the records consist of some 300,000 pages. With that in mind, we wanted to touch base with you regarding the time-lines.

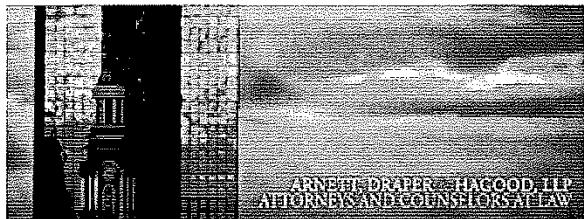
1. CMC still intends to diligently review the material as quickly as possible, keeping in mind that its attorneys have other clients and matters to attend. We anticipate conducting our review on a rolling basis (providing batches to SSC for review as we complete them).
2. While we will strive to meet the thirty-day timeline, we hereby inform the parties that it may ultimately be determined we cannot meet the same. We did not want to wait until the 28th day to inform the parties that the thirty-day window might not be attainable.

If you have any questions, please let us know.

Regards,

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